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Attorney for Defendants, HIRE A HELPER, LLC
and MICHAEL GLANZ

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

U-Haul International, Inc, a Nevada
corporation, e-Move, Inc., a Nevada
corporation,

Plaintiff,

v.

Hire a Helper, LLC, a California Corporation
limited liability company, Michael Glanz, an
individual,

Defendant.

AND RELATED COUNTERCLAIMS

Civil Action No.
08-CV-01801 H NLS

**JOINT MOTION REQUESTING
APPROVAL AND ENTRY OF
PROTECTIVE ORDER GOVERNING
CONTINUED SETTLEMENT
DISCUSSIONS**

Hon. Nita L. Stormes

1 Plaintiffs and Counterdefendants U-Haul International, Inc. and eMove, Inc.
2 (“Plaintiffs”) and Defendants and Counterclaimants Hire a Helper, LLC and Michael Glanz
3 (“Defendants”) appeared at an Early Neutral Evaluation Conference (“ENE”) on December 8,
4 2008. Although the case did not settle at that time, the parties agreed that client
5 representatives would meet without counsel to continue settlement discussions. For that
6 purpose, the Court ordered the parties to submit a proposed Stipulated Protective Order. The
7 parties hereby submit the following Joint Motion Requesting Approval and Entry of Proposed
8 Protective Order to facilitate these ongoing settlement discussions.

9 A continued telephonic ENE is set for January 9, 2009. The parties’ representatives
10 are scheduled to meet in Arizona on or about Friday, December 19, 2008. The parties and
11 their counsel may have other discussions in person or telephonically before the next
12 scheduled ENE on January 9, 2009.

13 It appearing to the Court that the parties have agreed to the terms of an appropriate
14 Protective Order to govern continued settlement discussions in this action,

15 IT IS HEREBY ORDERED:

16 1. Confidential Settlement Discussions. In accordance with Local Civil Rule
17 16.3(h), the continued settlement discussions between the parties shall be off the record,
18 privileged and confidential.

19 2. Nondisclosure and Nonuse Obligation. All discussions, documents and
20 information exchanged at the continued settlement conference and in any subsequent
21 settlement discussions between the parties shall not be used for any purpose other than to
22 assist settlement discussion of this matter. Each of the parties shall not in any way disclose
23 such discussions, documents and information of the other party to any third party, and will
24 not make use of such discussions, documents and information internally except as necessary
25 for settlement negotiations, discussions, and consultations with personnel or authorized
26 representatives of the other party for settlement purposes only.

27 3. Ownership of Confidential Information and Other Materials. All confidential
28 information and any derivatives thereof whether created by Discloser or Recipient, remain the

1 property of Discloser. All confidential information (including without limitation, documents,
2 drawings, sketches and plans) furnished by the Discloser to the Recipient, and any extracts
3 thereof, shall be returned by the Recipient to the Discloser promptly at its request, together
4 with any copies and extracts thereof, or shall be destroyed by the Recipient, and Recipient
5 shall provide to Discloser a certification attesting to such destruction.

6 4. Disclosure Does Not Affect Discoverability. Disclosure of any information
7 under this Order or between now and the ENE on January 9, 2009, does not change whether
8 or not such information is otherwise discoverable. All claims of relevance, confidentiality,
9 trade secret, and privilege continue to apply in the same way as if there had not been
10 disclosure. Conversely, disclosure of any such information does not create or afford any
11 greater protection than if the information had not been disclosed.

12 5. Inadmissible Settlement Negotiations. All discussions, documents and
13 information, exchanged at the conference between the parties scheduled for December 19,
14 2008, and otherwise between the parties and their counsel between now and the ENE on
15 January 9, 2009, shall be inadmissible under Federal Rules of Evidence, Rule 408 as
16 information that is part of accepting or offering a compromise of disputed claims and conduct
17 and statements made in compromise negotiations regarding the claims.

18 6. Nothing shall be filed under seal, and the Court shall not be required to take
19 any action, without separate prior order by the Judge before whom the hearing or proceeding
20 will take place, after application by the affected party with appropriate notice to opposing
21 counsel.

22 7. The Court may modify the terms and conditions of this Order for good cause,
23 or in the interest of justice or for public policy reasons, or on its own order at any time in
24 these proceedings.

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1 IT IS SO STIPULATED.

2 KNOBBE, MARTENS, OLSON & BEAR, LLP

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4 Dated: December 19, 2008

By: /s/Boris Zelkind

Lynda J. Zadra-Symes

Boris Zelkind

6 Attorneys for Plaintiff and Counterdefendant
7 U-HAUL INTERNATIONAL, INC. and Plaintiff
8 EMOVE, INC.

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11 CALIFORNIA BUSINESS LAW GROUP, PC

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13 Dated: December 19, 2008

By: /s/Duane S. Horning

Duane S. Horning

15 Attorney for Defendants and Counterclaimant,
16 HIRE A HELPER, LLC and MICHAEL GLANZ

17 IT IS SO ORDERED this ____ day of _____, _____

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21 Honorable Nita L. Stormes
22 United States District Court

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